



National Association of Flood & Stormwater Management Agencies

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**NAFSMA Recommendations for
Revising the 1983 Principles and Guidelines
in accordance with Section 2031, WRDA 2007**

**Presented by Steve Fitzgerald
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**Honorable John Paul Woodley, Jr.
Assistant Secretary of the Army (Civil Works)**

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Background

Water resource challenges and flood risk reduction projects have changed since the 1970's and 1980's, as have our values and perspectives. We applaud the Congress, Assistant Secretary of the Army (Civil Works), and the U.S. Army Corps of Engineers (Corps) for taking on this tough assignment – updating and revising the 1983 Principles and Guidelines.

The National Association of Flood and Stormwater Management Agencies (NAFSMA) is a 30-year old national organization based in the nation's capital that represents local, regional, and state flood and stormwater management agencies, most of which are located in large urban areas. NAFSMA members serve more than 76 million citizens by providing flood and/or stormwater management.

Many of our member agencies are local sponsors for Corps' projects within their communities. We are proud of our partnerships with the Corps and the many successful Federally-partnered projects that have reduced flood damages and loss of life in our communities while providing places for families to live with lower flood risks and desirable economic, social, and environmental conditions.

In making significant contributions to the cost of federal studies and projects, the sponsors have understandably taken a more active role in the identification, development, and implementation of flood risk management projects. Consequently, many have developed a high degree of planning, environmental, policy, and technical expertise. Local sponsors today are strong partners with the Corps, not just stakeholders. Because of this close partnership and teamwork, our mutual capability to reduce flood risks is greatly increased.

NAFSMA is pleased to present these suggestions and comments for revising the 1983 Principles and Guidelines. We understand the focus of today's public meeting is the Principles and Standards, which will be Phase I of the process, and that revisions to the Procedures will come later.

Principles and Standards Suggestions

The following suggestions are not ranked or prioritized.

1. Reduce emphasis on the National Economic Development (NED) plan. The other three accounts are just as important.

Even though identifying the NED plan is important, there needs to be equal emphasis on the other three accounts (environmental quality, regional economic development, and other social effects) when evaluating alternatives and selecting a plan to implement. Local sponsors typically incorporate multi-objective uses in flood risk reduction projects in order to garner community support and comply with other state and Federal regulations. Other objectives often include, but are not

limited to, public safety, water quality, ground water recharge, ecosystem restoration, environmental preservation and enhancements, aesthetics, and recreation. Planning studies should distinguish each of the multi-objective benefits and identify what part of the plan each party can help implement, including the Federal (Corps) share. These practices fall under the Corps definitions of integrated water resources management and collaborative planning.

2. Embrace and encourage local sponsors and others to contribute directly to the success of the planning and implementation, including the multi-objective uses.

The 1983 Standards language addressing the local sponsor role and public participation needs updating. Since local sponsors are true partners, recognize them in the Standards. Also, in many parts of the country, the expertise and knowledge is at the local and state level where governments, consultants, contractors, and local interest groups know their geographic areas and excel at their work. Using them will not only produce a better plan, but will also strengthen local ownership of the plan.

Examples include

- a. Corps contracts with local sponsor for specific tasks
- b. Local sponsor assumes the lead role during planning or construction
- c. Local or state agency contributes to the improvement of water quality
- d. Contract with local environmental organization to assist with data gathering for the Without Project Condition documentation
- e. Contract with local environmental organization(s) to contribute funding toward or construct environmental quality features
- f. If a non-structural plan is selected, local sponsor is best suited for implementation

3. Ease process for selection of the non-NED plan.

With multi-use projects and integrated water resources management in place, the NED plan may not be the recommended plan. The process for the recommended plan to proceed through the Federal review, approval, authorization, and appropriations process needs to be improved.

4. Continue use of four criteria (complete, effective, efficient, and acceptable) with equal treatment and allow analytical restrictions and professional judgment to shorten the planning process time.

First, treat the four criteria equally – e.g. acceptability is just as important as completeness, effectiveness and efficiency. All four are needed to have a successful plan or project.

Second, often the required level of analytical detail exceeds the return in identifying a better project or plan. Allow analytical restrictions or cutoffs, and professional judgment in evaluating alternatives and plan selection. We are concerned that the Corps' planning process is heading in the opposite direction following unfortunate publicity on navigation projects and the recent devastating Gulf Coast hurricanes. NAFSMA and local sponsors need to do a better job telling the rest of the story to Congress and the media.

- 5. Integrated risk management and risk informed decisions are good ideas, but do not add analytical requirements that lengthen the planning, design, and construction process. Develop guidelines for reporting risks to the public, local sponsors, and elected officials in terms that they can use to make decisions.**

When these risk items are added to the process, analytical requirements in the process that have little or no value added need to be reduced or eliminated. This should also reduce the process time needed. Also, include local sponsors in the development of guidelines or examples of ways to report risks so the non-technical public and officials can understand and use them to make decisions.

- 6. Emphasize addressing public safety in planning, design, construction, and operations of water resources projects.**

The water resources profession learned, or relearned, the importance of public safety from the 2004 and 2005 Gulf hurricanes. This needs to be incorporated into every phase of the process on the same level as environmental compliance and stewardship. Changes to project features and designs may not be noticeable, but public education, preparedness, and reaction will be critical to minimize loss of life. Since most of this responsibility will lie with local and state governments, this is a good example where directly involving the local sponsors and other local agencies in the planning process as presented in Suggestion 2 above would yield benefits.

- 7. Address the problem with low property value communities not able to compete with high property value communities in identification of the federal interest.**

This is an important issue that needs to be addressed primarily in urban areas. Local sponsors recognize this is an inherent problem with using only the NED approach to identify a federal interest. Other options for measuring benefits, such as the number of homes or number of people, are available.

8. Involve NAFSMA and other local sponsor organizations in the development of the Procedures. The planning process can be shortened, and better projects acceptable to the community can be identified.

Even though including collaboration, risk informed decision making, watershed planning, etc. into the planning process are good ideas, local sponsors are very concerned that this will add more time and costs to a process that already takes too long and costs too much. The fundamental Lean Six Sigma principle is that more reviews and added steps decrease productivity and lower product quality. Local sponsors want to work with the Corps and Congress on the Procedures and planning process to reduce the load on limited human and fiscal resources, and increase the chance of identifying a project that communities can support and afford.

Closing

Many stakeholders, organizations, and other concerned parties will have good recommendations and legitimate suggestions for revising the Principles and Standards. On behalf of your partners, the local sponsors, NAFSMA requests that we have a chance to review the next draft and provide suggestions, if necessary, before it becomes final. The local sponsors will work closely with the Corps to use, comply with, and help pay for implementing the Principles and Standards. Only together can we successfully reduce flood risk in this Country with appropriate regard for public safety, and community and natural values.

For questions or additional information, please contact:

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